Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0066-19-F Plant ID: 0066

Effective Date: 11/12/2019 Expiration Date: 11/30/2024

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: Consolidated Grain and Barge Co.
1047 S. 15th Street
Louisville, KY 40210

Owner: Consolidated Grain and Barge Co.
1047 S. 15th Street
Louisville, KY 40210

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: PM_{10}
Tons/year: 25

Application No.: See **Application and Related Documents** table.
Public Notice Date: 10/08/2019

Permit writer: Aaron DeWitt

Air Pollution Control Officer
11/12/2019

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Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
386-72-O	N/A	11/30/2004	Renewal	One (1) truck dump pit & let for unloading grain
204-84-O	N/A	11/30/2001	Renewal	15th st. Annex basement
205-84-O	N/A	11/30/2001	Renewal	Head house annex: grain handling
206-84-O	N/A	11/30/2001	Renewal	Head house annex: Six (6) mixing or cushion boxes
207-84-O	N/A	11/30/2001	Renewal	Oak st. Annex
208-84-O	N/A	11/30/2001	Renewal	Head house annex: rail loading
209-84-O	N/A	11/30/2001	Renewal	Head house annex: No. 2 track, truck loading only, with one Red Wing grain nozzle
210-84-O	N/A	11/30/2001	Renewal	Head house annex: rail unloading on #4 and #6 tracks
252-89-O	N/A	11/30/2001	Renewal	Two (2) oil application Dust Suppression Systems, Dustop Model 39500
253-89-O	N/A	11/30/2001	Renewal	One (1) MAC model #144 MCF361 Fabric filter
386-08-O	N/A	04/30/2006	Renewal	One (1) Carter Day baghouse, model RJ96
O-0066-16-M	N/A	12/16/2016	Admin	Permit issuance. Include replacement grain cleaner, E11 (IA)
O-0066-19-F	10/08/2019	11/12/2019	Initial	FEDOOP issuance based on testing performed 4/18/2019. Incorporate 2018 Construction permit and new truck loading IA (7/25/2019) into permit O-0066-16-M and re-issue as FEDOOP

Construction Permit Summary

Permit No.	Issue Date	Description
16-46-C	9/3/1946	Four (4) drying furnaces
384-72-C	10/26/1972	One (1) dust control system for truck dump pit, Flex-Kleen 100 RA 64 reverse pulse jet bag collector

Permit No.	Issue Date	Description
252-89-C	9/7/1989	One (1) oil Dust Suppression System rated at 15 gallons per hour. This equipment sprays FDA approved food grade white mineral oil on a grain laden moving conveyor.
253-89-C	9/7/1989	One (1) MAC model #141 MCF881 fabric filter with an 8 to 1 air to cloth ratio and rated at 52,000 cfm.
140-05-C	4/30/2005	One (1) Carter Day baghouse, model RJ96, to control PM emissions from the receiving truck dump bay.
248-09-C	11/30/2009	One (1) baghouse, make MikroPul/Pneumafil Reverse Air Filter, model 11.5-320-10, equipped with 320 bag filters and used to control emissions from six (6) fill and reclaim conveyors.
C-0066-1001-18-F	03/21/2018	Adding milling operation

Application and Related Documents

Document Number	Date	Description
94242	09/19/2018	New milling operation 6 month follow-up
94243	09/19/2018	Consolidated response to follow-up: just broke ground, hoping to have equipment running by end of year
96404	12/10/2018	Consolidated progress and question on stack testing methods
96405	12/10/2018	District response that Method 9, 5 and 210a are specified in permit
97636	03/19/2019	Stack test protocol submitted
97637	03/19/2019	Stack test review invoice
97647	03/18/2019	Stack test protocol
97656	03/20/2019	District comments on stack test protocol
97825	04/01/2019	Consolidated response to comments in stack test protocol including port location images
97918	04/05/2019	District request for distance to port locations
97946	04/09/2019	Consolidated notice that stack test to take place April 18, 2019
97974	04/11/2019	Consolidated response to request for distance to port locations
97975	04/11/2019	District email asking for confirmation of stack test date

Document Number	Date	Description
98622	06/05/2019	Stack test report
2949	7/22/2019	Consolidated Grain follow-up on next steps following stack test
2950	7/22/2019	District determination that stack test results qualify Consolidated a FEDOOP source and that an updated permit is forthcoming
2952	7/22/2019	Consolidated question if the PTE is based on 8,760 hours per year and if limited hours would make them a Minor source
2953	7/22/2019	District response that PTE is based on 8,760 hours per year, and that there is no way to limit operation and be a Minor source
2958	7/22/2019	Consolidated grain request for PTE calculations
2959	7/22/2019	District response to request for PTE calculations
2963	7/22/2019	Consolidated request for phone discussion
2964	7/22/2019	District response to request for phone discussion
2971	7/22/2019	District follow-up email after phone call. 100a, 100b and 200a sent to company to fill out FEDOOP STAR Exempt status and apply for new IA equipment
2972	7/22/2019	Consolidated installation planned dates and plan to return applications in the next few days
2988	7/23/2019	Consolidated questions of best way to submit applications
2989	7/23/2019	District response to question for way to submit applications
2991	7/23/2019	District comment that IA equipment can be submitted with a PTE showing a potential of less than 5 tpy does not require a filling fee
2993	7/23/2019	Consolidated response that they plan to submit a PTE showing the new equipment will be IA
2994	7/23/2019	District comment that a copy of the calculations must be submitted with 100A application
3113	7/25/2019	Scanned version of application 100A, 100B, and 200A.

Abbreviations and Acronyms

AP-42	- AP-42, *Compilation of Air Pollutant Emission Factors, published by U.S.EPA*
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO_x	- Nitrogen oxides
PM	- Particulate Matter
PM_{10}	- Particulate Matter less than 10 microns
$PM_{2.5}$	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO_2	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.

G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.

G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.

G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.

G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.

G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM_{10}, $PM_{2.5}$, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.

G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.

- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
- The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

Reporting Period	**Report Due Date**
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance with Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Emission Unit U1: Grain receiving, handling, storage and shipping

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.03	Authorization to Construct or Operate; Demolition / Renovation Notices and Permit Requirements	1 through 10
6.09	Standards of Performance for Existing Process Operations	1 through 5
7.08	Standards of Performance for New Process Operations	1 through 4

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	Truck receiving: One (1) truck dump pit[1]	1972	6.09	C2	Fugitive
E2	Rail Receiving: Rail unloading on #4 and #6 tracks. Only two of three pits are used (other one not connected).[2]	1984	7.08	C2	S1
E3	Truck Shipping: No. 2 track[3]	1984	7.08	C5	Fugitive
E4	Rail Shipping: Rail loading. No. 4 track.[4]	1984	7.08	C5	Fugitive
E5a	Thirty-eight (38) grain loaders[5]	1984	7.08	C1 & C2	S1
E5b	Two (2) belt heads (one on transfer floor and one in basement)[5]				
E5c	Three (3) transfer drags: Oak St. #1, #2 and Oak St. transfer[5]				
E5d	Transfer drag-to-separator drag[5]				
E5e	Six (6) mixing or cushion boxes on first floor.[6]				

1 Equipment previously permitted by 386-72-O.
2 Equipment previously permitted by 210-84-O.
3 Equipment previously permitted by 209-84-O.
4 Equipment previously permitted by 208-84-O.
5 Equipment previously permitted by 207-84-O.
6 Equipment previously permitted by 206-84-O.

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E5f	Shipper 1, Shipper 2, Receiver 2 & Seperator[5]				
E5g	Receiver 2 Drag and Receiver 2 Leg,[7]				
E5h	One (1) elevator leg for unloading grain at truck dump[1]	1984	7.08	C3	S2
E5i	Two (2) belt conveyors: 15th St. Top #1 & #2[5]	1984	7.08	C4	S3
E5j	North and South cross drags[5]				
E5k	Forty (40) grain loaders[5]				
E5l	Four (4) belt head discharge points[8]				
E5m	Two (2) covered screw conveyors[8]				
E5n	Two (2) covered drag conveyors[8]				
E5o	Four (4) garner bins on garner floor.[7]	1984	7.08	N/A	Fugitive
E5p	Four (4) scale bins on scale floor.[7]	1984	7.08	N/A	Fugitive
E6	Concrete upright bins. 2,294,000 bushel permanent storage capacity	1972	7.08	N/A	Fugitive
E7a	One (1) oat screen cleaner; make Crippen, model MF588RH, on first floor.[5]	1984	7.08	C2	Fugitive
E7b	One (1) rye screen cleaner, make Marot, model EAC-2004, capacity 200 ton/hr, on first floor.[9]	1997	7.08	C2	Fugitive
E7c	One (1) corn cleaner, make Tyler Ty-Rocket, model 660, on top floor.[5]	1984	7.08	N/A	Fugitive
E7d	One (1) corn scalper, make Tyler Ty-Rocket, model 330, on top floor.[5]	1984	7.08	N/A	Fugitive
E8a	One (1) receiving pit, make Sukup, model 7100, capacity 3,500 bushels/hr	2018	7.08	N/A	Fugitive
E8b	One (1) enclosed internal transfer, make Sukup, capacity 7 ton/hr	2018	7.08	C6	S4
E8c	One (1) storage bin, make Castlen Welding, capacity 7 ton/hr	2018	7.08	N/A	Fugitive

7 Equipment previously permitted by 205-84-O.
8 Equipment previously permitted by 204-84-O.
9 Equipment permit applied for 06/24/2016, DM#77932.

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E8d	One (1) roller mill, make Sengati Berga,model Prime 125/30 P4R, capacity 7 ton/hr	2018	7.08	C6	S4
E8e	One (1) bagging line, make Express Scale, capacity 7 ton/hr	2018	7.08	C6	S4
E8f	One (1) Mill truck load out, capacity 7 ton/hr (IA)	2019	7.08	N/A	Fugitive
E11	Six (6) fill and reclaim conveyors (IA)[10]	2009	7.08	C4	S3

Control Devices

Control ID	Description	Control Efficiency
C1	Two (2) oil application Dust Suppression System, make Dustop, model 39500, capacity 15 gallons per hour each. The equipment sprays FDA approved food grade white mineral oil on grain laden moving conveyors and elevator legs. Installed 2001.[11, 12]	60%
C2	One (1) fabric filter, make MAC, model #144 MCF361, capacity 52,000 cfm. 8 to 1 air to cloth ratio. Installed 2001.[13]	98%
C3	One (1) baghouse, make Carter Day, model RJ96, to control PM emissions from the receiving truck dump bay (pit). Installed 2005.[14]	98%
C4	One (1) baghouse, make MikroPul/Pneumafil Reverse Air Filter, model 11.5-320-10, serial number 2193, equipped with 320 bag filters, used to control emissions from six (6) fill and reclaim conveyors.[15]	98%
C5	Dust control socks placed at truck and railcar load-out spouts.	50%
C6	One (1) baghouse, make Kice, model VR96-10N[16]	99.98%

[10] Equipment previously permitted by 248-09-C.
[11] Equipment previously permitted by 252-89-O.
[12] Due to the oil being applied by spray nozzles in enclosed equipment, a vapor pressure of 0.5 mmHg at 20°C, and adsorption by the grain and grain dust, emissions will be less than five (5) tons per year, although permitted usage is 74,880 gallons per year (525,000 pounds per year).
[13] Equipment previously permitted by 253-89-O.
[14] Equipment previously permitted by 386-08-O.
[15] Equipment previously permitted by 138-10-O.
[16] Stack test completed on 4/18/2019.

U1 Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. Opacity

i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity.
[Regulation 6.09, section 3.1and Regulation 7.08, section 3.1.1]

b. PM/PM_{10}[17]

i. The owner or operator shall not allow the plantwide PM_{10} emissions to equal or exceed 25 tons during any consecutive 12-month period.
[Regulation 2.17, section 5.1] [Regulation 5.00, section 1.13.5.1]

ii. The owner or operator shall not allow the plantwide PM emissions to equal or exceed 25 tons during any consecutive 12-month period.
[Regulation 5.00, section 1.13.5.1]

iii. The owner or operator shall not allow the plantwide $PM_{2.5}$ emissions to equal or exceed 25 tons during any consecutive 12-month period.
[Regulation 5.00, section 1.13.5.1]

iv. The owner or operator shall not allow PM emissions to exceed the lb/hr standards in the table "Hourly PM Standards U1" based on actual operating hours in a calendar day.[18]

Table 1 Hourly PM Standards U1

Equipment	Standard (lb/hr)	Reg. Citation
E1	59.11	6.09, section 3.2
E2	42.41	7.08, section 3.1.2
E3	38.07	7.08, section 3.1.2
E4	38.07	7.08, section 3.1.2
E5a-E5p (combined)	58.50	7.08, section 3.1.2
E6	58.50	7.08, section 3.1.2
E7a-E7d (combined)	39.29	7.08, section 3.1.2

[17] Stack test completed 4/18/2019.
[18] It was determined through a one-time compliance demonstration for PM, dated 10/30/2017, that the lb/hr standard for E1, E2, E3, E4, E5a-E5p, E6, E7a-E7d, E8f, and E11 cannot be exceeded uncontrolled. For E8a-E8e the lb/hr standard cannot be exceeded controlled.

Equipment	Standard (lb/hr)	Reg. Citation
E8a-E8e (each)	12.00	7.08, section 3.1.2
E8f	12.00	7.08, section 3.1.2
E11 (each)	12.00	7.08, section 3.1.2

v. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. [Regulation 1.05, section 5]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys can be performed on the building exhaust points if the process is inside an enclosure.

ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR 60, Appendix A, within 24 hours of the initial observation.

iii. The owner or operator shall maintain records, monthly, of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

b. PM/PM_{10}

i. The owner or operator shall, daily, maintain records of the type and amount of product transferred.

ii. The owner or operator shall, daily, maintain records of the hours of operation of the equipment E8a-E8e.

iii. The owner or operator shall, daily, maintain records of any periods of time where the process was operating and the control device was not operating or a declaration that the control device operated at all times that day when the process was operating.

iv. If there is any time that the control device is bypassed or not in operation when the process is operating for emission points E8a-E8e, then the owner or operator shall keep a record of the following for each bypass event:

(1) Date;

(2) Start time and stop time;

(3) Identification of the control device and process equipment;

(4) PM emissions during the bypass in lb/hr;

(5) Summary of the cause or reason for each bypass event;

(6) Corrective action taken to minimize the extent or duration of the bypass event; and

(7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

v. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the baghouses for signs of damage, air leakage, corrosion, etc. and repair as needed.

vi. The owner or operator shall, monthly, keep records of the visual inspection of the structural and mechanical integrity of the baghouses.

S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

i. The owner or operator shall report the following information regarding opacity emissions:

(1) The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed. If no visible emissions were observed during the reporting period, the owner or operator may submit a negative declaration.

(2) The date, time and results of each Method 9 test conducted. If there were no Method 9 tests performed during the reporting, the owner or operator may submit a negative declaration.

(3) Description of any corrective action taken for each exceedance of the opacity standard.

b. PM/PM_{10}

i. The owner or operator shall report the following plantwide PM/PM_{10}/$PM_{2.5}$ emissions records in the annual compliance report:

(1) The beginning and end date of the reporting period:

(2) The monthly and 12 consecutive month period totals of PM/PM_{10}/$PM_{2.5}$ plant-wide emissions emitted each month during the reporting period.

ii. The owner or operator shall report the following information regarding bypasses for emission points E8a-E8e in the annual compliance reports.

(1) Number of times the vent stream bypasses the control device and is vented to the atmosphere;

(2) Duration of each bypass to the atmosphere;

(3) Cause of bypass event;

(4) PM emission in lb/hr during the bypass event;

(5) Corrective action taken to minimize the extent or duration of the bypass event; and

(6) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

(7) A negative declaration if no bypasses occurred.

iii. The owner or operator shall report any and all periods of failure to perform visual inspections of the structural and mechanical integrity of the control device.

Insignificant Activities

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Fill and reclaim conveyors (E11)	6	3.34 PM_{10}	Regulation 1.02, section 1.38
Oil dust suppression system, Dustop model 39500 (C1)	2	0.92 VOC	Regulation 1.02, section 1.38
Mill truck load out (E8f)	1	0.89 PM_{10}	Regulation 1.02, section 1.38

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.

2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.

3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.

4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.

6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Attachment A - Default Emission Factors, Calculation Methodologies, & Stack Tests

Generally, emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc.) or hours of operation of the equipment by the appropriate emission factor and accounting for any control devices unless otherwise approved in writing by the District.

Table 1 - U1 Milling Operation

Emission Point ID	Description	Control Device	Acceptable Emission Factor Sources and Calculation Methodology
E1	Truck receiving: One (1) truck dump pit	C2	Uncontrolled PM emissions = throughput (lb/hr) * EF from AP-42 9.9.1 (until stack test results are accepted) Controlled PM emissions = Uncontrolled PM emissions * (1-.98)
E2	Rail Receiving: Rail unloading on #4 and #6 tracks. Only two of three pits are used (other one not connected).	C2	
E3	Truck Shipping: No. 2 track	C5	
E4	Rail Shipping: Rail loading. No. 4 track.	C5	
E5a	Thirty-eight (38) grain loaders	C1 & C2	
E5b	Two (2) belt heads (one on transfer floor and one in basement)		
E5c	Three (3) transfer drags: Oak st. #1, #2 and Oak St. transfer		
E5d	Transfer drag-to-separator drag		
E5e	Six (6) mixing or cushion boxes on first floor.		
E5f	Shipper 1, Shipper 2, Receiver 2 & Seperator		
E5g	Receiver 2 Drag and Receiver 2 Leg,		
E5h	One (1) elevator leg for unloading grain at truck dump	C3	
E5i	Two (2) belt conveyors: 15th St. Top #1 & #2	C4	
E5j	North and South cross drags		
E5k	Forty (40) grain loaders		
E5l	Four (4) belt head discharge points		
E5m	Two (2) covered screw conveyors		
E5n	Two (2) covered drag conveyors		
E5o	Four (4) garner bins on garner floor.	N/A	
E5p	Four (4) scale bins on scale floor.	N/A	
E6	Concrete upright bins. 2,294,000 bushel permanent storage capacity	N/A	
E7a	One (1) oat screen cleaner; make Crippen, model MF588RH, on first floor.	C2	
E7b	One (1) rye screen cleaner, make Marot, model EAC-2004, capacity 200 ton/hr, on first floor.	C2	
E7c	One (1) corn cleaner, make Tyler Ty-Rocket, model 660, on top floor.	N/A	

Table 1 - U1 Milling Operation			
Emission Point ID	**Description**	**Control Device**	**Acceptable Emission Factor Sources and Calculation Methodology**
E7d	One (1) corn scalper, make Tyler Ty-Rocket, model 330, on top floor.	N/A	
E11	Six (6) fill and reclaim conveyors (IA)	C4	
E8a	One (1) receiving pit, make Sukup, model 7100, capacity 3,500 bushels/hr	N/A	Uncontrolled PM emissions = 164.73 (lb/hr) * operating time (hr) Controlled PM emissions = Uncontrolled PM emissions * (1-.9998)
E8b	One (1) enclosed internal transfer, make Sukup, capacity 7 ton/hr	C6	
E8c	One (1) storage bin, make Castlen Welding, capacity 7 ton/hr	N/A	
E8d	One (1) roller mill, make Sengati Berga, model Prime 125/30 P4R capacity 7 ton/hr	C6	
E8e	One (1) bagging line, make Express Scale, capacity 7 ton/hr	N/A	
E8f	One (1) Mill truck load out, capacity 7 ton/hr	N/A	

Attachment B - Protocol Checklist for a Performance Test

A complete protocol must include the following information

1. Facility name, location, and Plant ID number.
2. Responsible Official and environmental contact names.
3. Permit numbers that are requiring the test to be conducted.
4. Test methods to be used (*i.e.* EPA Method 1, 2, 3, 4, and 5).
5. Alternative test methods or description of modifications to the test methods to be used.
6. Purpose of the test including equipment and pollutant to be tested. (The purpose may be described in the permit that requires the test to be conducted or it may be to show compliance with a federal regulation or emission standard.)
7. Tentative test dates. (These may change but the District will need final notice at least 10 days in advance of the actual test dates in order to arrange for observation.)
8. Maximum rated production capacity of the system.
9. Production-rate goal planned during the performance test for demonstration of compliance (if appropriate, based on limits) and justification of the planned production rate, if less than the maximum rate.
10. Method to be used for determining rate of production during the performance test;
11. Method to be used for determining rate of production during subsequent operations of the process equipment to demonstrate compliance.
12. Description of normal operation cycles, if applicable.
13. Discussion of operating conditions that tend to cause worse case emissions. This is especially important to clarify if worst case emissions do not result from the maximum production rate.
14. Process flow diagram.
15. The type and manufacturer of the control equipment, if any.
16. The process and/or control equipment parameters to be monitored and recorded during the performance test. These parameters may include pressure drops, flow rates, pH, temperature, *etc*. The values achieved during the test may be required during subsequent operations to describe the operating parameters that are indicative of good operating performance.
17. How quality assurance and accuracy of the data will be maintained, including sample identification and chain-of-custody procedures, audit sample provider, and number of audit samples to be used, if applicable.
18. Diameter of the pipe, duct, stack, or flue to be tested.
19. Distances from the testing sample ports to the nearest upstream and downstream flow disturbances such as bends, valves, constrictions, expansions, and exit points for outlet and additionally for inlet.
20. The number of traverse points to be tested for the outlet and the inlet if required, using Appendix A-1 to 40 CFR Part 60.

The Stack Test Review fee must be submitted with each stack test protocol.

The current fee is listed on the APCD website (louisvilleky.gov/APCD)

Fee Comment

1. The initial issuance permit fee is $2,731.42.
2. The company is required to pay annual fees.